



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

May 5, 2008

James L. Lowe, District Ranger
Gauley Ranger District
932 N. Fork Cherry Road
Richwood, WV 26261

Re: Supplemental Draft Environmental Impact Statement Lower Williams Project Area (LWPA), Vegetation Management and Wildlife Habitat Improvements, Monongahela National Forest January 2008 Webster County, WV CEQ# 20080083

Dear Mr. Lowe:

In accordance with the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act the United States Environmental Protection Agency (EPA) has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the above referenced project. EPA has assigned this (SDEIS) a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of the project. A copy of EPA's ranking system is enclosed for your information. The basis for this rating is detailed in the comments provided below.

Project Description:

The Lower Williams Project Area (LWPA) consists of 14,397 acres within Webster County, West Virginia. Approximately 92% of the project area is National Forest Land and the remaining 8% is private land. The proposed action is to perform vegetation management and wildlife habitat improvements within the project area consistent with the 2006 Monongahela National Forest Plan. All of the Forest Service land in the project area is within Management Prescription (MP) 3.0. The Forest Plan standards and guidelines for management in MP 3.0 emphasize the even-aged system of silviculture when shade intolerant species such as oaks are the species objective. The forest plan recommends a mosaic of hardwood stands varying in size structure and species composition to provide habitat for a variety of wildlife species. Other habitat components called for in the forest plan include maintaining 3-8% of the area in permanent wildlife openings and retention or creation of permanent water sources.

The purpose and need for this action is to:

- Create early successional forest habitat and permanent openings to improve habitat for species such as deer, grouse, and squirrel;
- Reduce the amount of competition between trees for light and water resources in dense over crowded stands to provide for sustainable timber and mast production;
- Regenerate shade-intolerant tree species and diversity of forest age classes to improve



the long-term sustainability of timber and increase the quality and growth rate of crop trees and mast producing trees.

Alternatives:

According to the DEIS and SDEIS, during the scoping process, three major issues were identified: erosion and sedimentation, acid sensitive soils, and early successional habitat and openings. Five alternatives are considered in detail. These are Alternative 1 (No Build) and four action alternatives. Alternative 2 is the proposed action alternative presented to the public during scoping. Alternative 3 is a modified version of the proposed action to address the issues identified before and after scoping. Alternatives 4 and 5 address the issues raised by proposing less conventional logging, more helicopter logging, dropping units, and no new road construction.

Alternative 3 was the Preferred Alternative in the DEIS. Further analysis found running buffalo clover (federally listed endangered species) and nodding pogonia (Regional Forester's sensitive species) in areas that would be affected by proposed harvest, road maintenance, and /or hauling activities. According to the SDEIS Alternative 6 is the new Preferred Alternative and would harvest the least acres (1, 595 acres) of all the action alternatives, would not have any major impacts to threatened and endangered species and /or sensitive species, and would implement projects to improve water crossings. Alternative 6 has 2 miles of existing corridor road reconstruction, 11-20 miles of road hardening, 2 miles of new road construction, 42 miles of skid trails, 19 acres of helicopter log landings and 8 acres of conventional log landings.

General Comments:

An Executive Summary would be helpful to the reader. The SDEIS should also clearly explain the purpose of this document.

As stated in our August 27, 2007 comments on the DEIS, the Preferred Alternative should be identified more clearly in the document. Alternative 2 is identified as the Proposed Alternative throughout the document. This could lead the reader to assume that the Proposed Alternative (Alternative 2) is the Preferred Alternative (Alternative 6).

The SDEIS should discuss impacts associated with the Preferred Alternative (Alternative 6) in detail. In general the text describes impacts associated with the Proposed Alternative (Alternative 2) and other Action Alternatives in greater detail than the Preferred Alternative (Alternative 6). For example, Table 12 "Forest Fragmentation Impacts by Alternative" only contains the "No Action", Alternative 2 (Proposed Action), and Alternative 5. Another example is the discussion of the Social Environment for Alternatives 1-5 on Page 159. Alternative 6 is not included. It is unclear if there are impacts to the Social Environment from Alternative 6.

Table 15 "Wetland and riparian habitat RFSS plants that could occur in the Lower Williams vicinity" should include references for the habitats listed.

The Sections describing threatened, endangered, species of concern, Regional Forester's sensitive species, etc. should clearly identify the species listing in the text.

Page 92 discusses running buffalo clover and states that no activities would directly



impact populations or change light regimes. Another potential impact to sensitive species resulting from the action alternatives could be changes in hydrology. This should be considered.

The project team should continue to coordinate with appropriate state and federal agencies regarding threatened, endangered, and other species of concern.

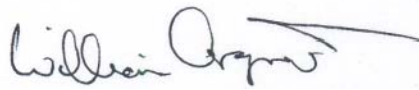
The non-native invasive plant section beginning on page 100 should reference Executive Order 13112 and include a discussion of monitoring and rapid response plans. The section discusses introduction of invasive species in disturbed areas and the action alternatives will cause disturbances.

The SDEIS states that all streams and other aquatic habitats are not inventoried. The SDEIS should provide more information about avoidance, minimization, and mitigation measures regarding impacts to the aquatic environment and other environmental features, including those that may be encountered during implementation of any of the alternatives.

We continue to recommend the use of bridges or oversized natural bottom culverts, time of year restrictions for some work, and fencing around sensitive areas where warranted.

Thank you for the opportunity to offer these comments. If you have any questions, please contact Barbara Okorn at (215)814-3330.

Sincerely,

A handwritten signature in dark ink, appearing to read 'William Arguto', with a long horizontal stroke extending to the right.

William Arguto,
NEPA Team Leader

